

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

IN RE: Russell and Alisha Brooks	}	CASE NO. 15-80927
	}	CHAPTER 13

MOTION TO MODIFY PLAN

Comes now Russell and Alisha Brooks, Debtors, and moves to modify their Chapter 13 Plan after confirmation and shows the Court as follows:

1. The Debtor's confirmed plan provides to pay the continuing mortgage, pre-petition arrears and post petition arrears to American Financial Resources, and to pay the secured claim of Ford Motor Credit for a 2006 Ford Escape;
2. The bar date for filing claims was January 6, 2016 and neither American Financial Resources nor Ford Motor Credit filed claims in this case;
3. The Debtors propose to modify the plan to change the payment to Ford Motor Credit and pre-petition and post petition arrears of American Financial Resources;
4. The debtor has also had a change in job which has caused his monthly income to decrease requiring that his plan payment be reduced;
5. As a result of the proposed request to Modify the Plan, the following secured claims will be affected:

<u>Creditor</u>	<u>Collateral</u>	<u>Description of the Change</u>
Ford Motor Credit	2006 Ford Escape	No payment will be made

American Fin. Resources Pre and Post Petition No payments will be made
Arrears

WHEREFORE, Debtor respectfully moves the Court for an Order for Allowing the Debtors to Modify their Plan Post Confirmation.

Respectfully submitted,
Russell and Alisha Brooks

By: /s/ Terry D. Bigby

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CERTIFICATE OF MAILING

Terry D. Bigby, attorney for Debtors, does hereby certify that on 5-10-16, true and correct copies of the **Motion to Modify, Notice of Motion and Modified Plan and Summary Notice of Incorporation of Terms of Original Plan And Statement of Material Changes to Treatment of Claims** were mailed by electronic mail or first class mail with proper postage prepaid to all creditors listed on the mailing matrix and all interested parties.

Dated: May 10, 2016

/s/ Terry D. Bigby

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